

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	
	:	
Nicole Wilkins	:	Case No.: 16-15547(MDC)
	:	
Debtor(s)	:	Chapter 13

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**RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC  
STAY FILED BY EXETER FINANCE, LLC**

**COMES NOW**, Debtor, Daniel J. Lewis, hereinafter referred to as “Debtor,” by and through their undersigned Counsel, Brad J. Sadek, Esquire, and in response to the Motion for Relief filed by Exeter Finance, LLC, “Movant”, and hereby avers the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied. By way of further response, it is specifically requested that the undersigned Counsel be provided with a complete post-petition payment history.
8. Denied.
9. Denied.
10. Admitted.
11. Denied.
12. Denied.

13. Denied.

14. Denied.

**WHEREFORE**, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Respectfully submitted,

Dated: May 22, 2020

/s/ Brad J. Sadek, Esq.

Brad J. Sadek, Esq.

Attorney for the Debtor

Sadek & Cooper

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